

## ASHBY & GEDDES

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April 19, 2007

The Honorable Gregory M. Sleet  
United States District Court  
844 King Street  
Wilmington, Delaware 19801

VIA ELECTRONIC FILING

Re: *Telcordia Technologies, Inc. v. Lucent Technologies, Inc.*,  
C.A. No. 04-875-GMS

*Telcordia Technologies, Inc. v. Cisco Systems, Inc.*,  
C.A. No. 04-876-GMS

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Dear Judge Sleet:

I am writing to provide the parties' joint proposed agenda for the teleconference with the Court that has been scheduled for 2:00 p.m. tomorrow, April 20, 2007, in the above actions:

**Telcordia's Issues:**

In connection with former France Telecom employee Thierry Houdoin: (i) whether defendants have complied with the Court's instruction at the pretrial conference to make their best efforts to secure his attendance at a deposition prior to trial, and (ii) whether the witness should be permitted to testify at trial if he declines to sit for a deposition prior to trial.

Attached for the Court's review are copies of all communications between counsel and Mr. Houdoin since the pretrial conference.

**Defendants' Issues:**

(1) Defendants disagree with Telcordia's argumentative and inaccurate statement of the issue concerning Mr. Houdoin. Defendants requested this conference because Mr. Houdoin would like to know whether, if he were to agree to travel to the United States for trial, he would also be requested to appear for a deposition.

(2) Plaintiff's submission last Friday of the supplemental report of its expert, Dr. Clark, containing new opinions, and its refusal to make Dr. Clark available for his deposition.

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Respectfully,

*/s/ Steven J. Balick*

Steven J. Balick

SJB/dmf  
Attachment  
179834.1

cc: Donald R. Dunner, Esquire (via electronic mail; w/attachment)  
John W. Shaw, Esquire (by hand, and via electronic mail; w/attachment)  
Steven C. Cherny, Esquire (via electronic mail; w/attachment)  
David A. Nelson, Esquire (via electronic mail; w/attachment)  
Jack B. Blumenfeld, Esquire (by hand, and via electronic mail; w/attachment)  
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